

# **EXHIBIT 1**

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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IN RE AUTOMOTIVE PARTS  
ANTITRUST LITIGATION

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Master File No. 12-md-02311  
Honorable Marianne O. Battani

In Re: Instrument Panel Clusters	2:12-cv-00200
In Re: Fuel Senders	2:12-cv-00300
In Re: Heater Control Panels	2:12-cv-00400
In Re: Bearings	2:12-cv-00500
In Re: Occupant Safety Systems	2:12-cv-00600
In Re: Alternators	2:13-cv-00700
In Re: Anti-Vibrational Rubber Parts	2:13-cv-00800
In Re: Windshield Wipers	2:13-cv-00900
In Re: Radiators	2:13-cv-01000
In Re: Starters	2:13-cv-01100
In Re: Automotive Lamps	2:13-cv-01200
In Re: Switches	2:13-cv-01300
In Re: Ignition Coils	2:13-cv-01400
In Re: Motor Generators	2:13-cv-01500
In Re: HID Ballasts	2:13-cv-01700
In Re: Inverters	2:13-cv-01800
In Re: Electronic Powered Steering Assemblies	2:13-cv-01900
In Re: Fan Motors	2:13-cv-02100
In Re: Fuel Injection Systems	2:13-cv-02200
In Re: Power Window Motors	2:13-cv-02300
In Re: Automatic Transmission Fluid Warmers	2:13-cv-02400
In Re: Valve Timing Control Devices	2:13-cv-02500
In Re: Air Conditioning Systems	2:13-cv-02700
In Re: Windshield Washer Systems	2:13-cv-02800
In Re: Constant Velocity Joint Boot Products	2:14-cv-02900
In Re: Spark Plugs	2:15-cv-03000
In Re: Oxygen Sensors	2:15-cv-03100

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This Document Relates to:  
All Actions

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**DEFENDANTS' MEMORANDUM REGARDING DISPUTED PROVISIONS  
CONTAINED IN THE PARTIES' PROPOSED DEPOSITION PROTOCOLS**

**Exhibit 1**  
**List of Defendants Joining the Motion**<sup>1</sup>

1. Instrument Panel Clusters, 2:12-cv-00200

Continental Automotive Electronics LLC, Continental Automotive Systems, Inc., Continental Automotive Korea Ltd., DENSO Corporation, DENSO International America, Inc., Yazaki Corporation, Yazaki North America Inc.

2. Fuel Senders, 2:12-cv-00300

DENSO Corporation, DENSO International America Inc., Yazaki Corporation, Yazaki North America, Inc.

3. Heater Control Panels, 2:12-cv-00400

Alps Automotive Inc., Alps Electric (North America), Inc., Alps Electric Co., Ltd., DENSO Corporation, DENSO International America Inc., K & S Wiring Systems Inc., Sumitomo Electric Industries, Inc., Sumitomo Electric Wiring Systems, Inc., Sumitomo Electric Wintec America, Inc., Sumitomo Wiring Systems, Ltd., Sumitomo Wiring Systems (U.S.A.) Inc., Tokai Rika Co., Ltd., TRAM, Inc.

4. Bearings, 2:12-cv-00500

SKF USA Inc., JTEKT Corporation, JTEKT North America Corporation, formerly known as Koyo Corporation of U.S.A., Nachi America Inc., Nachi-Fujikoshi Corporation, NSK Americas, Inc., NSK Ltd., NTN Corporation, NTN USA Corporation, Schaeffler Group USA Inc.

5. Occupant Safety Systems, 2:12-cv-00600

Takata Corporation, TK Holdings, Inc., Tokai Rika Co., Ltd., TRAM, Inc., Toyoda Gosei Co., Ltd., Toyoda Gosei North America Corporation, TG Missouri Corporation

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<sup>1</sup> Certain Defendants in the above-captioned actions have been served, but are not yet required under the various scheduling orders entered by this Court to either challenge personal jurisdiction or raise any other defense permitted under Fed. R. Civ. P. 12(b). Those Defendants solely join the above brief for the limited purpose of supporting Defendants' arguments concerning the deposition protocol to be entered in this action, and hereby reserve their right to raise any defense, including, but not limited to, a challenge to personal jurisdiction, in response to the pending consolidated amended complaints or any other version of consolidated amended complaints that may be filed.

6. Alternators, 2:13-cv-00700

DENSO Corporation, DENSO International America, Inc., DENSO International Korea Corporation, DENSO Products & Services Americas, Hitachi Ltd., Hitachi Automotive Systems Ltd., American Mitsuba Corporation, Mitsuba Corporation, Mitsubishi Electric Automotive America, Inc., Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Robert Bosch GmbH, Robert Bosch LLC

7. Anti-Vibrational Rubber Parts, 2:13-cv-00800

Bridgestone APM Company, Bridgestone Corporation, DTR Industries, Inc., Sumitomo Riko Company Limited, Toyo Automotive Parts (USA), Inc., Toyo Tire & Rubber Co., Ltd., Toyo Tire North America Manufacturing Inc., Toyo Tire North America OE Sales LLC, Yamashita Rubber Co., Ltd., YUSA Corporation

8. Windshield Wipers, 2:13-cv-00900

DENSO Corporation, DENSO International America, Inc., DENSO International Korea Corporation, ASMO Co., Ltd., ASMO North America, LLC, ASMO Greenville of North Carolina, Inc., American Mitsuba Corporation, Mitsuba Corporation, Robert Bosch GmbH, Robert Bosch LLC

9. Radiators, 2:13-cv-01000

Calsonic Kansei Corporation, Calsonic Kansei North America, Inc., DENSO Corporation, DENSO International America, Inc., American Mitsuba Corporation, Mitsuba Corporation

10. Starters, 2:13-cv-01100

DENSO Corporation, DENSO International America, Inc., Hitachi Automotive Systems, Ltd., Hitachi Automotive Systems Americas Ltd., American Mitsuba Corporation, Mitsuba Corporation, Mitsubishi Electric Automotive America, Inc., Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., Robert Bosch GmbH, Robert Bosch LLC

11. Automotive Lamps, 2:13-cv-01200

Koito Manufacturing Co., Ltd., North American Lighting, Inc., American Mitsuba Corporation, Mitsuba Corporation, Stanley Electric Co., Ltd., Stanley Electric U.S. Co., Inc., II Stanley Co.,

12. Switches, 2:13-cv-01300

Tokai Rika Co., Ltd., TRAM, Inc.

13. Ignition Coils, 2:13-cv-01400

DENSO Corporation, DENSO International America, Inc., DENSO International Korea Corporation, DENSO Products & Services Americas, Diamond Electric Mfg. Co., Ltd., Diamond Electric Mfg. Corporation, Hitachi Automotive Systems Americas, Inc., Hitachi Automotive Systems, Ltd., Hitachi, Ltd., Mitsubishi Electric Automotive America, Inc., Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., Weastec, Inc.

14. Motor Generators, 2:13-cv-01500

DENSO Corporation, DENSO International America, Inc.

15. HID Ballasts, 2:13-cv-01700

DENSO Corporation, DENSO International America, Inc., Koito Manufacturing Co., Ltd., North American Lighting, Inc., Mitsubishi Electric Automotive America, Inc., Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., Stanley Electric Co., Ltd., Stanley Electric U.S. Co., Inc., II Stanley Co., Inc.

16. Inverters, 2:13-cv-01800

DENSO Corporation, DENSO International America, Inc.

17. Electronic Powered Steering Assemblies, 2:13-cv-01900

JTEKT Automotive North America, Inc., JTEKT Corporation, American Mitsuba Corporation, Mitsuba Corporation, Mitsubishi Electric Automotive America, Inc., Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., American Showa Inc., Showa Corporation, NSK Americas, Inc., NSK Ltd., NSK Steering Systems America, Inc., NSK Steering Systems Co., Ltd., Yamada Manufacturing Co., Yamada North America, Inc.

18. Fan Motors, 2:13-cv-02100

American Mitsuba Corporation, Mitsuba Corporation

19. Fuel Injection Systems, 2:13-cv-02200

Aisan Industry Co., Ltd., Aisan Corporation of America, Franklin Precision Industry, Inc., Hyundam Industrial Co., Ltd., DENSO Corporation, DENSO International America, Inc., DENSO International Korea Corporation, Hitachi Automotive Systems Americas, Inc., Hitachi Automotive Systems, Ltd., Hitachi,

Ltd., Keihin Corporation,<sup>2</sup> Keihin North America, Inc., Mikuni American Corporation, American Mitsuba Corporation, Mitsuba Corporation, Mitsubishi Electric Automotive America, Inc., Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., Robert Bosch GmbH, Robert Bosch LLC,

20. Power Window Motors, 2:13-cv-02300

DENSO Corporation, DENSO International America, Inc., DENSO International Korea Corporation, ASMO North Carolina, LLC, ASMO North Carolina, Inc., American Mitsuba Corporation, Mitsuba Corporation, Robert Bosch GmbH, Bosch LLC

21. Automatic Transmission Fluid Warmers, 2:13-cv-02400

Calsonic Kansei North America, Inc., Calsonic Kansei Corporation, DENSO Corporation, DENSO International America, Inc.

22. Valve Timing Control Devices, 2:13-cv-02500

Aisin Automotive Casting, LLC, Aisin Seiki Co., Ltd., DENSO Corporation, DENSO International America, Inc., DENSO International Korea Corporation, Mikuni American Corporation, Mitsubishi Electric Automotive America, Inc., Mitsubishi Electric Corporation

23. Air Conditioning Systems, 2:13-cv-02700

Calsonic Kansei North America, Inc., Calsonic Kansei Corporation, DENSO Corporation, DENSO International America, Inc., MAHLE Behr GmbH & Co. KG, MAHLE Behr USA Inc., Mitsubishi Heavy Industries America, Inc., Mitsubishi Heavy Industries Climate Control, Inc., Mitsubishi Heavy Industries, Ltd., Panasonic Corporation, Panasonic Corporation of North America, Sanden International (U.S.A.) Inc., Showa Aluminum Corporation of America, Showa Denko, K.K., Valeo Climate Control Corporation, Valeo Electrical Systems, Inc., Valeo Inc., Valeo Japan Co., Ltd.

24. Windshield Washer Systems, 2:13-cv-02800

DENSO Corporation, DENSO International America, Inc., ASMO Co., Ltd., ASMO Manufacturing, Inc., ASMO North America, LLC, American Mitsuba Corporation, Mitsuba Corporation

25. Constant Velocity Joint Boot Products, 2:14-cv-02900

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<sup>2</sup> Keihin Corporation has moved to dismiss, including for lack of personal jurisdiction. Its motion remains pending. Keihin does not waive and expressly reserves the right to argue any jurisdictional defense or any other defense.

Toyo Automotive Parts (USA), Inc., Toyo Tire & Rubber Co., Ltd.

26. Spark Plugs, 2:15-cv-03000

DENSO Corporation, DENSO International America, Inc., DENSO Products & Services Americas, NGK Spark Plugs Co. Ltd., NGK Spark Plugs (USA) Inc., Robert Bosch GmbH, Robert Bosch LLC

27. Oxygen Sensors, 2:15-cv-03100

DENSO Corporation, DENSO International America Inc., DENSO Products & Services Americas, NGK Spark Plug Co. Ltd., NGK Spark Plugs (U.S.A) Holding, Inc., NGK Spark Plugs (U.S.A), Inc., NTK Technologies, Inc., Robert Bosch GmbH, Robert Bosch LLC